

# EXHIBIT G

**Fitzgerald, Maureen P.**

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**From:** Fitzgerald, Maureen P. <MPFitzgerald@MDWCG.com>  
**Sent:** Tuesday, March 7, 2023 10:36 AM  
**To:** Michael Mule  
**Subject:** FW: Voynow

Hi Michael,

Got your vm. We are unable to present a witness today to appear based upon the amended notice. As stated yesterday, we do not have agreement on the scope and topics of the notice. Your office declined to participate in any further meet and confer session so yesterday, we filed the joint letter required prior to filing a motion for protective order. Once we have clarity from the court on the notice, we can discuss rescheduling the deposition.



**Maureen P. Fitzgerald**

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**From:** Fitzgerald, Maureen P.  
**Sent:** Monday, March 6, 2023 12:25 PM  
**To:** 'Michael Mule' <MichaelMule@mllaborlaw.com>; Jamie Felsen <jamiefelsen@mllaborlaw.com>  
**Cc:** Sulock, Alesia S. <ASSulock@MDWCG.com>; Jeremy Koufakis <jeremy@mmmlaborlaw.com>; Joseph Labuda <joe@mllaborlaw.com>  
**Subject:** RE: Voynow

Michael,

Since we are not in agreement re the topics/scope, we need court intervention on this issue. So I just sent a draft letter to your firm asking for your input before sending to the judge.

Re McCloskey, I'm not sure if he has retained a NY lawyer but his PA lawyer is Bill Goldman at [bill@goldmanlawoffices.com](mailto:bill@goldmanlawoffices.com).

As to the court's order for a 3/23 in person conference, I'm on a prepaid vacation that week in FL. I'm going to ask that she either hold it by telephone or push it to the following week for an in person. Can you let me know by the end of the day if there is any objection to this request.

Thanks, Maureen



**Maureen P. Fitzgerald**

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